

## UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

UNITED STATES OF AMERICA

v.

**FILED**

CRIMINAL COMPLAINT

JOSEPH DONELSON, JR.

JAN 29 2007

CASE NUMBER:

MAGISTRATE JUDGE DENLOW

**07CR 0043**MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about January 16, 2007, in COOK county, in the Northern District of Illinois, defendant did:

by force and violence, and by intimidation, take from the person or presence of bank employees at Chase Bank located at 120 South LaSalle, Chicago, Illinois, approximately \$11,835 in United States Currency belonging to and in the care, custody, control, management, and possession of Chase Bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation,

in violation of Title 18 United States Code, Section 2113(a).

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

**See attached affidavit.**

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

Sworn to before me and subscribed in my presence,

January 29, 2007  
Date

at

Chicago, Illinois  
City and State

Morton Denlow, U.S. Magistrate Judge  
Name & Title of Judicial Officer

Morton Denlow  
Signature of Judicial Officer

John P. Munk  
Signature of Complainant

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"). I have been an FBI Special Agent since September 2006. I was a state trooper with the Mississippi Highway Patrol from October 1996 until I joined the FBI. I left the Mississippi Highway Patrol as a Master Sergeant in the Criminal Investigation Bureau/Major Crimes Unit. I am currently assigned to the Violent Crimes Task Force of the Chicago Field Division of the FBI, which investigates violent crimes, including robberies of financial institutions.

3. On January 16, 2007 at approximately 4:55 p.m., a branch of Chase Bank located at 120 South LaSalle, Chicago, Illinois, was robbed by a black male, later identified as Joseph Donelson ("Donelson"). During the robbery, Donelson was wearing a green army-type jacket and a dark colored knit cap with a short bill. Donelson approached the victim teller and presented a handwritten note that read, "Hold up Gun Give 100 50 20's." Donelson then told the teller, "Hurry up, I know you have a drawer, I want \$50's and \$100's." The victim teller handed Donelson money from the drawer, and Donelson told the teller, "I know you have more, give me the \$100's, I have a

fucking gun." The victim teller then gave Donelson more of the money from the drawer. Donelson exited the bank taking \$11,835 of the bank's money. Donelson left the demand note at the teller counter.

4. At the time of the bank robbery on January 16, 2006, the deposits of the Chase Bank, 120 La Salle Street, Chicago, Illinois, were insured by the Federal Deposit Insurance Corporation.

5. The bank robber's image was captured on bank surveillance video. Certain digital images taken from the surveillance video were sent electronically to a list of Chicago-area businesses maintained by the Chicago Police Department in an effort to identify the bank robber. Based on these circulated images, the Chicago Police Department was contacted by a security director for a Chicago-area hotel. The security director recognized the bank robber in the bank surveillance digital image. Specifically, the security director stated that the person in the digital image was Joseph Donelson, a former employee for Food Team, a food service company that did contract work at the Chicago-area hotel.

6. A representative of Food Team subsequently confirmed that Donelson had previously worked for Food Team. This same representative also stated that Donelson's last day working for Food Team was December 26, 2006.

7. A photograph line up was conducted with the victim teller to determine if she could identify the bank robber. The victim teller was shown six photographs of various men similar to Donelson's appearance. Donelson was one of the six men pictured. The victim teller immediately identified Joseph Donelson as the man who robbed the Chase Bank on January 16, 2007.

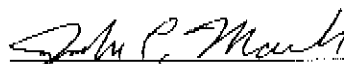
8. On November 9, 1990, Donelson was convicted in the Northern District of Illinois of committing four bank robberies. Based on this conviction, Donelson was sentenced to 236

months imprisonment. In June 2006, Donelson was released on supervised release to the Salvation Army half-way house at 105 South Ashland Avenue, Chicago, Illinois.


9. A representative responsible for Donelson's case and familiar with Donelson personally through his work at the Salvation Army was contacted by the FBI. The Salvation Army representative stated that Donelson's stay at Salvation Army was terminated on January 10, 2007 based on certain rule violations by Donelson. This same Salvation Army representative was then shown digital images taken during the Chase Bank robbery. The Salvation Army representative identified the bank robber as Donelson. He also identified the coat and hat worn by Donelson during the robbery as clothes that he had previously seen Donelson wearing.

10. Based on the above information, there is probable cause to believe that Joseph Donelson robbed the Chase Bank located at 120 South La Salle, Chicago, Illinois on January 16, 2007, in violation of Title 18, United States Code, Section 2113(a).

FURTHER AFFIANT SAYETH NOT.

  
John C. Marsh  
Special Agent  
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence  
this 29th day of January 2007.

  
MORTON DENLOW  
United States Magistrate Judge